

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

|                                  |   |                        |
|----------------------------------|---|------------------------|
| UNITED STATES OF AMERICA,        | : | Case No. 3:12CV231     |
|                                  | : |                        |
| Plaintiff,                       | : | Judge Timothy S. Black |
| v.                               | : |                        |
|                                  | : |                        |
| (1) ACCOUNT CONTENTS OF          | : |                        |
| PNC BANK, ACCT#*****0482, et al. | : |                        |
|                                  | : |                        |
| Defendants.                      | : |                        |

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**WARRANT OF ARREST IN REM**

To the United States Marshal for the Southern District of Ohio, and/or any duly authorized law enforcement officer:

WHEREAS a verified Complaint for Forfeiture in Rem has been filed by the United States alleging that the Defendants: (1) Account Contents of PNC Bank, Acct#\*\*\*\*\*0482, In The Name of Geolam Inc., DBA: Main Food Express Food Mart, In The Amount of \$10,223.38, (2) Account Contents of PNC Bank, Acct#\*\*\*\*\*0212, In The Name of Geolam Inc., DBA: Main Food Express Food Mart, Manager Acct., In The Amount of \$1,622.55, (3) Account Contents of PNC Bank, Acct#\*\*\*\*\*0204, In The Name of Geolam Inc., DBA: Main Food Express Food Mart, In The Amount of \$1,316.91, (4) Account Contents of PNC Bank, Acct#\*\*\*\*\*2997, In The Name of Lama Daoud, In The Amount of \$1,268.44, (5) \$2,661.00 U.S. Currency, (6) \$207.00 U.S. Currency, (7) \$182.00 U.S. Currency, (8) 2002 Lexus LX470, VIN: JTJHT00W523513550, and (9) Miscellaneous Jewelry (hereinafter collectively "Defendants") are subject to forfeiture to the United States pursuant to 7 U.S.C. §2024(e);

18 U.S.C. §981(a)(1)(A) and/or (C); and/or 18 U.S.C. §1029(c)(1)(C); and the Court having reviewed the complaint, the Court hereby finds that there is probable cause to believe that:

1. The Defendants are moneys or things of value furnished in exchange for benefits, or anything of value obtained by use of an access device, in any manner contrary to Chapter 51 of Title 7 or the regulations issued under such Chapter and are therefore subject to forfeiture pursuant to 7 U.S.C. §2024 (e).

2. The Defendants are personal property, which were involved in a transaction or attempted transaction in violation of 18 U.S.C. §1956, or are property traceable to such property, and are therefore subject to forfeiture pursuant to 18 U.S.C. §981(a)(1)(A);

3. The Defendants are subject to forfeiture pursuant to 18 U.S.C. §981(a)(1)(C) as proceeds traceable to a violation of any offense constituting “specified unlawful activity” (as defined in Section 1956(c)(7) of this title), or a conspiracy to commit such offense, including a violation of 7 U.S.C. §2024 (Illegal Use or Redemption of SNAP Benefits); 18 U.S.C. §1343 (Wire Fraud); 18 U.S.C. §641 (Unemployment Fraud); 18 U.S.C. §1029 (Access Device Fraud); 18 U.S.C. §1956 and/or 18 U.S.C. §1957.

4. The Defendants are subject to forfeiture pursuant to 18 U.S.C. §1029(c)(1)(C) as they are property used or intended to be used to commit a violation of 18 U.S.C. §1029.

THEREFORE YOU ARE COMMANDED to:

1. Arrest and seize the defendants:
  - a. Account Contents of PNC Bank, Acct#\*\*\*\*\*0482, In The Name of Geolam Inc., DBA: Main Food Express Food Mart, In The Amount of \$10,223.38;

- b. Account Contents of PNC Bank, Acct#\*\*\*\*\*0212, In The Name of Geolam Inc., DBA: Main Food Express Food Mart, Manager Acct., In The Amount of \$1,622.55;
- c. Account Contents of PNC Bank, Acct#\*\*\*\*\*0204, In The Name of Geolam Inc., DBA: Main Food Express Food Mart, In The Amount of \$1,316.91;
- d. Account Contents of PNC Bank, Acct#\*\*\*\*\*2997, In The Name of Lama Daoud, In The Amount of \$1,268.44;
- e. \$2,661.00 U.S. Currency;
- f. \$207.00 U.S. Currency;
- g. \$182.00 U.S. Currency;
- h. 2002 Lexus LX470, VIN: JTJHT00W523513550; and
- i. Miscellaneous Jewelry

and retain the defendants in your custody or make arrangements for a substitute custodian for the defendants, and use discretion and whatever means appropriate to protect and maintain the defendants until further order of this Court;

2. Provide notice of this action and the arrest of the defendants and of the right to contest the forfeiture of the defendants in accordance with Rule G(4) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions. Such notice shall specify the time within which a claim, and an answer or motion under Rule 12 of the Federal Rules of Civil Procedure.

3. Make prompt return to the Court of this Warrant after it is executed.

Date: 7/16/12

Timothy S. Black  
Judge Timothy S. Black  
United States District Court Judge